

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

UNITED STATES OF AMERICA

VS.

4:20-CR-00185-01-JM

KEVIN BAILEY

ORDER

Defendant's Motion to Reduce Sentence (Doc. No. 74) is DENIED.

Guideline Amendment 821 does not change Defendant's criminal history category. His criminal history category is VI based on his status as an Armed Career Criminal. Even if Defendant was not an Armed Career Criminal, his criminal history score would go from 19 to 18, but his criminal history category and guideline range would remain the same.¹

IT IS SO ORDERED this 12th day of March, 2025.



UNITED STATES DISTRICT JUDGE

¹ See U.S.S.G 1.10 (a)(2) (“Exclusions.—A reduction in the defendant’s term of imprisonment is not consistent with this policy statement and therefore is not authorized under 18 U.S.C. § 3582(c)(2) if— . . . an amendment listed in subsection (d) does not have the effect of lowering the defendant’s applicable guideline range.”).